

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING  
(PROPOSAL TEN)

Docket No. RM2020-2

MOTION OF THE UNITED STATES POSTAL SERVICE FOR  
LEAVE TO FILE REPLY COMMENTS REGARDING PROPOSAL TEN  
(March 9, 2020)

Order No. 5336 (December 4, 2019) established the procedural schedule in this proceeding and, while setting a date for initial comments, made no provision for reply comments. In accordance with that Order, initial comments were filed on February 28, 2020 by the Public Representative. The Public Representative identifies a number of alleged deficiencies, and recommends that the proposal be rejected in its entirety. PR Comments at 3. The Postal Service believes that the concerns expressed by the Public Representative are unfounded, and therefore requests leave to file reply comments addressing the claims and arguments he advances.

The questions raised by the Public Representative regard matters of both theoretical principles and empirical application. The Postal Service strongly disagrees with much of the analysis offered in the Public Representative comments, and in particular the conclusions drawn therefrom. In order to afford the Commission with a more complete discussion of these matters, which the Postal Service has had no previous opportunity to address, the Postal Service seeks leave to respond in otherwise unauthorized reply comments. The Postal Service reply comments are proffered in a separate pleading submitted concurrently. Acceptance of those reply comments would enhance the Commission's ability to evaluate fairly the criticisms of Proposal Ten

advanced in the PR Comments, and would thus create a more complete record for consideration of the Proposal.

Wherefore, the Postal Service respectfully requests leave to file reply comments responding to the initial comments with respect to Proposal Ten filed in this proceeding by the Public Representative.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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March 9, 2020